

174882



BellSouth Telecommunications, Inc.  
Legal Department  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

patrick.turner@bellsouth.com

Patrick W. Turner  
General Counsel-South Carolina

803 401 2900  
Fax 803 254 1731

July 20, 2005

RECEIVED  
JUL 21 2005  
SOUTH CAROLINA  
PUBLIC SERVICE COMMISSION

Mr. Charles Terreni  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Post Office Drawer 11649  
Columbia, South Carolina 29211

Re: Petition to Establish Generic Docket to Consider Amendments to Interconnection  
Agreements Resulting From Changes of Law  
Docket No.: 2004-316-C

Dear Mr. Terreni:

Enclosed for filing are an original and ten copies of BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of Meredith E. Mays in the above-referenced matter. By copy of this letter, I am serving the same on all parties of record.

Sincerely,

A handwritten signature in cursive script that reads "Patrick W. Turner".

Patrick W. Turner

PWT/nml  
Enclosures  
cc: All Parties of Record  
DM5 # 592864

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

In Re:

Petition to Establish Generic Docket to  
Consider Amendments to Interconnection  
Agreements Resulting From Changes of Law

Docket No. 2004-316-C

**MOTION FOR ADMISSION PRO HAC VICE**

BellSouth Telecommunications, Inc. ("BellSouth") respectfully moves the Public Service Commission of South Carolina ("the Commission") to permit Meredith E. Mays, to practice pro hac vice before the Commission in the above-referenced matter. Pursuant to Rule 404 of the South Carolina Appellate Court Rules, Ms. Mays, together with the undersigned counsel of record, have filed an application for admission *pro hac vice* with the Supreme Court of South Carolina. Exhibit A to this Motion is a file-stamped copy of that application, along with a Certificate of Service indicating that the application and the \$100 filing fee have been filed with the Supreme Court.

Respectfully submitted, this 20<sup>th</sup> day of July 2005.

BELLSOUTH TELECOMMUNICATIONS, INC.



PATRICK W. TURNER  
Suite 5200  
1600 Williams Street  
Columbia, South Carolina 29201  
(803) 401-2900

RECEIVED

2005 DEC 20 AM 3:49

SO. DIST. CT. CLERK  
COMMERCIAL

# EXHIBIT A

BellSouth Telecommunications, Inc.  
Legal Department  
1600 Williams Street  
Suite 5200  
Columbia, SC 29201

patrick.turner@bellsouth.com

Patrick W. Turner  
General Counsel-South Carolina

803 401 2900  
Fax 803 254 1731

July 20, 2005

**RECEIVED**

JUL 20 2005

**S.C. SUPREME COURT**

Ms. Gail Watts  
Deputy Clerk for Admissions  
South Carolina Supreme Court of Bar Admissions  
Post Office Box 11330  
Columbia, South Carolina 29211

Re: Petition to Establish Generic Docket to Consider Amendments to  
Interconnection Agreements Resulting From Changes of Law  
Docket No.: 2004-316-C

Dear Ms. Watts:

Pursuant to Rule 404 of the S.C.A.C.R, enclosed for filing are the original and one copy of BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of Meredith E. Mays in the above-referenced matter with the requested filing fee of \$100.00.

If you have any questions or need any additional information, please do not hesitate to contact me.

Sincerely,



Patrick W. Turner

PWT/nml  
Enclosures  
DM5 # 592854

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

**RECEIVED**

JUL 20 2005

**S.C. SUPREME COURT**

In Re: )  
 )  
Petition to Establish Generic Docket to ) Docket No. 2004-316-C  
Consider Amendments to Interconnection )  
Agreements Resulting From Changes of Law )  
\_\_\_\_\_ )

**APPLICATION FOR ADMISSION  
PRO HAC VICE**

Comes now Meredith E. Mays, applicant herein, and respectfully represents the following:

1. Applicant is an employee of BellSouth Telecommunications, Inc., 675 West Peachtree Street, NE, Atlanta, Fulton County, Georgia, 30375, Telephone Number 404-335-0750, Fax Number 404 614-4054, as in-house counsel.

2. Applicant has been retained personally or as a member of the above named legal department to provide legal representation in connection with the above case now pending before named court of the State of South Carolina.

3. Since October of 1995, applicant has been, and presently is, a member in good standing of the bar of the highest court of the State of Georgia. Attached is a certificate of good standing.

4. Applicant has been admitted to practice before the following courts:

Court:	Date Admitted.
United States District Ct. – N.Dist. GA	January 29, 1996
United States Ct. of Appeals – 11 <sup>th</sup> Circuit	February 2, 1996
United States Ct. of Appeals – 4 <sup>th</sup> Circuit	April 27, 1998

5. Applicant presently is not subject to any suspension or disbarment proceedings, and has not been formally notified of any complaints pending before a disciplinary agency.

6. Applicant never has had any application for admission *pro hac vice* in this or any other jurisdiction denied or any *pro hac vice* admission revoked.

7. Applicant never has had any certificate or privilege to appear and practice before any administrative body suspended or revoked.

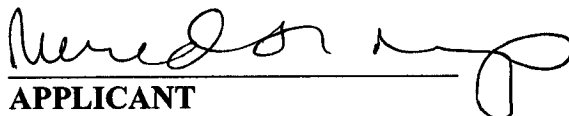
8. Local counsel of record associated with applicant in this case is Patrick W. Turner of BellSouth Telecommunications, Inc., Suite 5200, 1600 Williams Street, Richland County, Columbia, South Carolina, 29201, Telephone Number (803) 401-2900.

9. Applicant has not previously filed an application to appear *pro hac vice* in South Carolina.

10. Applicant agrees to comply with the applicable statutes, laws and rules of the State of South Carolina and will familiarize him/herself with and comply with the South Carolina Rules of Professional Conduct. Applicant consents to the jurisdiction of the South Carolina courts and Commission on Lawyer Conduct.

11. Applicant respectfully requests to be admitted to practice in the above named court for this case only.

DATED this 7 day of July, 2005.

  
\_\_\_\_\_  
APPLICANT

**VERIFICATION**

STATE OF GEORGIA     )  
                                      )  
COUNTY OF FULTON    )

I, Meredith E. Mays, do hereby swear or affirm under penalty of perjury that I am the applicant in the above styled matter; that I have read the foregoing application and know the contents I hereof; and that the contents are true of my own knowledge, except as to those matters stated on information and belief, and that as to those matters I believe them to be true.

  
\_\_\_\_\_  
**APPLICANT/AFFIANT**

Subscribed and sworn to before me this 1<sup>st</sup> day of July, 2005.


  
\_\_\_\_\_  
Notary Public for the State of Georgia

My Commission Expires: \_\_\_\_\_  
Lynn J. Barclay  
Notary Public, DeKalb County, Georgia  
My Commission Expires August 13, 2006.

### LOCAL COUNSEL CONSENT

I hereby consent, as local counsel of record, to the association of applicant in this cause pursuant to Rules Governing Admission *Pro Hac Vice* to the South Carolina Bar.

DATED this 19<sup>th</sup> day of July, 2005.

  
\_\_\_\_\_  
Local Counsel of Record



# STATE BAR OF GEORGIA



*Supporting Lawyers' Service to the Public and the Justice System*

**Ms. Meredith Ellen Mays**  
**BellSouth Telecommunications, Inc.**  
**BellSouth Center, Suite 4300**  
**675 West Peachtree Street, N.E.**  
**Atlanta, GA 30375**

**CURRENT STATUS:**      **Active Member**

**DATE OF ADMISSION TO PRACTICE:**      **11/07/1995**

**Attorney Bar Number: 479765**

**Today's Date:**      **June 1, 2005**

Listed below are the disciplinary actions, if any, which have been taken against this member:

Supreme Court Docket #	State Disciplinary Board Docket #	Disposition
NA	NA	N/A

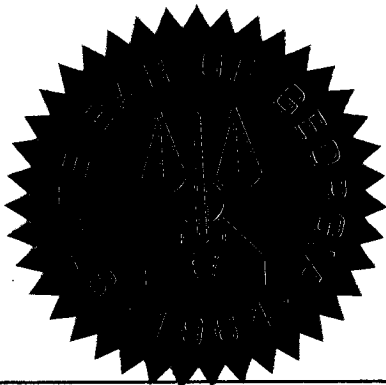
The prerequisites for practicing law in the State of Georgia are as follows:

- Must be certified by the Office of Bar Admissions, either by exam, or on motion (**Reciprocity**)
- Sworn in to the Superior Court in Georgia
- Enrolled with the State Bar of Georgia which is an arm of the Supreme Court of Georgia

Under the privacy/confidentiality provision of the Bar Rule 4-221(d), any complaint against a member resolved prior to the filing and docketing of a disciplinary case in the Supreme Court is not a matter of public record, and may not be revealed without a waiver from the member. It is the policy of the State Bar of Georgia to answer any inquiry about a member by disclosing only those complaints that have been docketed in the Supreme Court. With respect to matters that are currently pending as active, undocketed cases, when an inquiry is received, the State Bar of Georgia shall not disclose the existence of those complaints. Such non-disclosure should not be construed to confirm the existence of confidential complaints since the vast majority of members in good standing are not the subjects of such confidential complaints.

This member is currently in "good standing" as termed and defined by State Bar Rule 1-204. The member is current in license fees and is not suspended or disbarred as of the date of this letter.

This document hereby certifies that the above-mentioned individual is a registered member of the State Bar of Georgia and is currently in good standing.



## STATE BAR OF GEORGIA

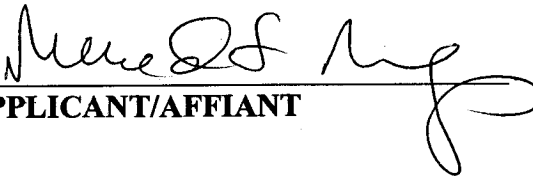
  
Toni Peterson  
Official Representative of State Bar of Georgia

**HEADQUARTERS**  
104 Marietta Street NW, Suite 100  
Atlanta, Georgia 30303  
(404) 527-8700 ■ (800) 334-6865  
FAX (404) 527-8717  
[www.gabar.org](http://www.gabar.org)

**SOUTH GEORGIA**  
244 E. Second Street (Zip 31794)  
P.O. Box 1390  
Tifton, Georgia 31793-1390  
(229) 387-0446 ■ (800) 330-0446  
FAX (229) 382-7435

### **CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of this application upon the South Carolina Supreme Court by hand delivery mail addressed to: South Carolina Supreme Court Office of Bar Admissions, P.O. Box 11330, Columbia, SC 29211, accompanied by payment of the \$100 filing fee payable to the South Carolina Supreme Court on this 7<sup>th</sup> day of July, 2005.

  
\_\_\_\_\_  
**APPLICANT/AFFIANT**

STATE OF SOUTH CAROLINA

)

CERTIFICATE OF SERVICE

)

COUNTY OF RICHLAND

)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Motion for Admission *Pro Hac Vice* of Meredith E. Mays in Docket No. 2004-316-C to be served upon the following this July 20, 2005.

Florence P. Belser, Esquire  
General Counsel  
Post Office Box 11263  
Columbia, South Carolina 29211  
(Office of Regulatory Staff)  
**(U. S. Mail and Electronic Mail)**

Stan Bugner  
State Director  
1301 Gervais Street  
Suite 825  
Columbia, South Carolina 29201  
(Verizon)  
**(U. S. Mail and Electronic Mail)**

Steven W. Hamm, Esquire  
C. Jo Anne Wessinger Hill, Esquire  
Richardson, Plowden, Carpenter & Robinson, P.A.  
1600 Marion Street  
Post Office Box 7788  
Columbia, South Carolina 29202  
(Verizon)  
**(U. S. Mail and Electronic Mail)**

Jocelyn G. Boyd, Esquire  
Staff Attorney  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

SO 10-11-20 5:13 PM  
2005 JUL 20 5:13 PM  
PSC 11-20

F. David Butler, Esquire  
Senior Counsel  
S. C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U. S. Mail and Electronic Mail)**

Joseph Melchers  
Chief Counsel  
S.C. Public Service Commission  
Post Office Box 11649  
Columbia, South Carolina 29211  
(PSC Staff)  
**(U.S. Mail and Electronic Mail)**

Robert E. Tyson, Jr., Esquire  
Sowell Gray Stepp & Laffitte  
1310 Gadsden Street  
Columbia, South Carolina 29211  
(ITC^Delta Com Communications, Inc.)  
**(U. S. Mail and Electronic Mail)**

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
Post Office Box 11390  
Columbia, South Carolina 29211  
(SCTC)  
**(U. S. Mail and Electronic Mail)**

William Atkinson, Esquire  
Attorney, State Regulatory  
3065 Cumberland Circle  
Mailstop GAATLD0602  
Atlanta, Georgia 30339  
(United Telephone Company of the Carolinas and  
Sprint Communications Company, L.P.)  
**(U. S. Mail and Electronic Mail)**

Russell B. Shetterly, Esquire  
P. O. Box 8207  
Columbia, South Carolina 29202  
(Knology of Charleston and Knology of  
South Carolina, Inc.)  
**(U. S. Mail and Electronic Mail)**

Darra W. Cothran, Esquire  
Woodward, Cothran & Herndon  
1200 Main Street, 6th Floor  
Post Office Box 12399  
Columbia, South Carolina 29211  
(MCI WorldCom Network Service, Inc.  
MCI WorldCom Communications and  
MCImetro Access Transmission Services, Inc.)  
**(U. S. Mail and Electronic Mail)**

John J. Pringle, Jr., Esquire  
Ellis Lawhorne & Sims, P.A.  
Post Office Box 2285  
Columbia, South Carolina 29202  
(AT&T)  
**(U. S. Mail and Electronic Mail)**

Marsha A. Ward, Esquire  
Kennard B. Woods, Esquire  
MCI WorldCom, Inc.  
Law and Public Policy  
6 Concourse Parkway, Suite 3200  
Atlanta, Georgia 30328  
(MCI)  
**(U. S. Mail and Electronic Mail)**

Frank R. Ellerbe, Esquire  
Bonnie D. Shealy, Esquire  
Robinson, McFadden & Moore, P.C.  
1901 Main Street, Suite 1200  
Post Office Box 944  
Columbia, South Carolina 29202  
(South Carolina Cable Television Association)  
**(U. S. Mail and Electronic Mail)**

Genevieve Morelli  
Kelley, Drye & Warren, LLP  
1200 19<sup>th</sup> Street, N.W.  
Washington, D.C. 20036  
(KMC Telecom III, Inc.)  
**(U. S. Mail and Electronic Mail)**

John D. McLaughlin, Jr.  
Director, State Government Affairs  
KMC Telecom, Inc.  
1755 North Brown Road  
Lawrenceville, GA 30043  
(KMC Telecom)  
**(U. S. Mail and Electronic Mail)**

Scott A. Elliott, Esquire  
Elliott & Elliott  
721 Olive Street  
Columbia, South Carolina 29205  
(Sprint/United Telephone)  
**(U. S. Mail and Electronic Mail)**

Marty Bocock, Esquire  
Director of Regulatory Affairs  
1122 Lady Street, Suite 1050  
Columbia, South Carolina 29201  
(Sprint/United Telephone Company)  
**(U. S. Mail and Electronic Mail)**

Bonnie D. Shealy, Esquire  
Robinson McFadden & Moore, P. C.  
1901 Main Street, Suite 1200  
P. O. Box 944  
Columbia, South Carolina 29202  
(US LEC of South Carolina)  
**(U. S. Mail and Electronic Mail)**

Andrew O. Isar  
Director – State Affairs  
7901 Skansie Avenue, Suite 240  
Gig Harbor, WA 98335  
(ASCENT)  
**(U. S. Mail and Electronic Mail)**

Nanette Edwards, Esquire  
ITC^DeltaCom Communications, Inc.  
4092 S. Memorial Parkway  
Huntsville, Alabama 25802  
**(U. S. Mail and Electronic Mail)**

Henry Campen, Esquire  
Parker, Poe, Adams & Bernstein, L.L.P.  
150 Fayetteville Street Mall, Suite 1400  
Raleigh, North Carolina 27601  
(US LEC of South Carolina)  
**(U. S. Mail and Electronic Mail)**

Glenn S. Richards, Esquire  
Shaw Pittman LLP  
2300 N. Street, NW  
Washington, DC 20037  
(AmeriMex Communications Corp.)  
**(U. S. Mail and Electronic Mail)**



Nyla M. Laney

PC Docs # 554784